

Handwritten: V/Brad
Handwritten: NDRA 62
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
00063
137740

DATE: April 20, 1987

SUBJECT: Johns - Manville/Waukegan, IL/Draft ROD

Handwritten signature: Karl E. Bremer
FROM: Karl E. Bremer, Acting Chief
Solid Waste Branch

William H. Miner, Chief
TO: Hazardous Waste Enforcement Branch

We have reviewed the above-referenced draft ROD, which accompanied a March 31, 1987, memorandum from Brad Bradley of your staff. Since we have no record of having reviewed the RI/FS, our remarks are limited to information available in the draft ROD.

It appears that the primary contaminant of concern is asbestos, which is not a RCRA hazardous waste as defined in 40 CFR Part 261. Consequently, no RCRA standards apply to its handling. It also appears that, though chromium, lead and other hazardous constituents are present on the site - - your office has made a determination that no Part 261 hazardous wastes are present. That is, we infer from the draft ROD that no wastes listed in Part 261 Subpart D, nor Subpart C characteristically hazardous wastes, have been identified.

If the above inferences are correct, no RCRA standards are applicable to remediation at the site.

If you have any questions, please contact James Mayka, of my staff, at 6-0987.